



Department
for Education

Consultation Response Form

Consultation closing date: 16 April 2013
Your comments must reach us by that date.

**Reform of the National Curriculum in
England**

Consultation Response Form

THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online response facility available on the Department for Education e-consultation website (<http://www.education.gov.uk/consultations>).

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If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Please tick if you want us to keep your response confidential. ☐

Reason for confidentiality:

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Organisation (if applicable) Association for Language Learning

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If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Public Communications Unit by e-mail:

consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](#) page.

Please tick one category that best describes you as a respondent

<input type="checkbox"/> Primary School	<input type="checkbox"/> Secondary School	<input type="checkbox"/> Special School
<input type="checkbox"/> Organisation representing school teachers	<input checked="" type="checkbox"/> Subject Association	<input type="checkbox"/> Parent
<input type="checkbox"/> Young Person	<input type="checkbox"/> Higher Education	<input type="checkbox"/> Further Education
<input type="checkbox"/> Academy	<input type="checkbox"/> Employer/Business Sector	<input type="checkbox"/> Local Authority
<input type="checkbox"/> Teacher	<input type="checkbox"/> Other	

Please Specify: The Association for Language Learning is the UK's major national professional subject association for teachers and teacher educators of modern languages in primary and secondary schools. We have close links with ISMLA, the Independent Schools Modern Language Association and with other professional subject associations through the Council of Subject Associations; in addition, we maintain links with the University Council of Modern Languages and the National Association of Language Advisers.

Are you answering this consultation in response to particular subjects? Please tick all those that apply.

<input type="checkbox"/> English	<input type="checkbox"/> mathematics	<input type="checkbox"/> science
<input type="checkbox"/> art & design	<input type="checkbox"/> citizenship	<input type="checkbox"/> computing
<input type="checkbox"/> design & technology	<input type="checkbox"/> geography	<input type="checkbox"/> history
<input checked="" type="checkbox"/> languages	<input type="checkbox"/> music	<input type="checkbox"/> physical education
<input type="checkbox"/> Not applicable		

1 Do you have any comments on the proposed aims for the National Curriculum as a whole as set out in the framework document?

Comments:

Observations in this response will address the National Curriculum proposals for **modern foreign languages only**.

1.12 ALL agrees fully with the statement expressed in the framework document, '*Proficiency in languages is vital to the future economic well-being of this country.*' This assertion is supported by research evidence from the State of the Nation Report, British Academy (2013), the British Chambers of Commerce (2012), the Confederation of British Industry (2012), and the Education and Employers Taskforce (2011). We, therefore, welcome the compulsory study of language learning in KS2.

The statement continues by arguing that the introduction of languages in KS2 '*will enable schools to be more ambitious about languages in secondary school.*'

While we would agree with the aspiration of this statement, it is not a given that the introduction of statutory status of language learning in KS2 will automatically lead to greater ambition in secondary school. This aspiration is dependent on a number of key variables, which include:

1. Coherent, high quality curriculum development over the period of seven years of statutory provision of language learning, which lays the foundation for further language study post 14, post 16 and into higher education;
2. Willingness of schools and school leaders to set in place strategic development networks for regional and local dialogue to enable joint curriculum planning between primary and secondary schools;
3. Effective transition and transfer arrangements;
4. Development of clear and shared understanding of learning outcomes and expectations at national and local levels;
5. Availability and capacity of primary and secondary teachers with relevant, high quality subject specialist knowledge to introduce languages across KS2 and, where appropriate, reintroduce languages in KS4;
6. Access to high quality professional development for all subject teachers to support curriculum development and planning;
7. Access to intensive language training and high quality online objects for self-study for non-specialists in primary schools and those in need of language upskilling in either primary or secondary sectors.

2 Do you agree that instead of detailed subject-level aims we should free teachers to shape their own curriculum aims based on the content in the programmes of study?

☐

Agree

X Disagree

☐

Not sure

Comments: In the interests of equality of opportunity for all learners, the profession must agree a set of shared curriculum aims for modern foreign languages. This is not incompatible with the desire to encourage greater professional autonomy in developing appropriate curricula to respond to the needs of individual cohorts of learners.

The Association is very comfortable with the underpinning principle of trusting to teachers' expertise in developing **how** they teach and agree that decisions about approaches and methods should be made as close to the point of learning as possible. Teacher autonomy and professionalism in the context of the classroom is a different thing from deciding overall curriculum aims, which should be a matter of national interest and should be common to all schools across the country.

The Association would be keen to support the process of developing national aims for modern foreign languages in consultation with practising teachers through our national membership and through our branches and networks across the country. We recommend that such a process should be research-informed and should involve teachers, head teachers and a range of other language experts.

3 Do you have any comments on the content set out in the draft programmes of study?

Comments:

Primacy of focus on Intercultural Understanding

The Purpose of Study sets out the aspirations for language learning over the seven years of statutory provision, emphasising that language learning is a '*liberation from insularity*', providing '*an opening to other cultures*'. This is warmly welcomed by our members.

Although it is implicit that the culture of the countries and communities where the language is spoken provides the essential context for language learning activities and it is the cultural context which '*fosters pupils' curiosity and deepens their understanding of the world*', as express in the Purpose of Study, many consultation responses from schools and universities have expressed regret that intercultural understanding is not explicitly mentioned in the aims and subject content of the POS for both KS2 and KS3. This is a missed opportunity and leads to misunderstanding.

It is also apparent that readers of the POS are unclear that the Purpose of Study and Aims for Languages pertain to **both** key stages.

It is highly recommended to include an explicit reference to intercultural understanding in the content of the POS and that the presentation of the Purpose of Study and aims

makes plain that they define the full seven year period of compulsory language learning.

Developing independent and confident language learners

The emphasis on *communication for practical purposes, expressing ideas and thoughts, speaking with increasing confidence, fluency and spontaneity, saying what they want to say* is extremely positive and addresses areas of perceived weakness regularly identified in Ofsted's synoptic reports.

There has been a need to strengthen learners' independent control of language and this is provided in KS2 and KS3 by the focus on exploring patterns and adapting language in KS2 to make meaning in familiar and routine matters and then sharpening metacognition and extending language use beyond their immediate needs and interests in KS3 through the explicit introduction of a grammar and vocabulary section and a broadening of the range of linguistic competences.

New elements of content could prove counterproductive without CPD support

Because the POS is minimalist in its presentation, it would benefit from some non-statutory exemplars and guidance. The Association for Language Learning could act as a nexus for such developments and could contribute to a national pilot to develop the new POS for KS2 and KS3, which would help to embed policy and strengthen the understanding of some aspects of the POS which are less familiar such as transcription, translation and the introduction of literary texts.

All of these elements could enrich the POS, if fully understood and developed creatively through teacher-led pilots and sharing of approaches. Equally, in the absence of guidance and networking some of elements of the new content in the POS could be open to serious misunderstanding and lead to reductive, uninspired teaching and lesson planning, which would be counterproductive and would not achieve the desired outcomes of the curriculum reform.

Grammar is a bonus

The renewed focus on grammar has been welcomed, as it has been understood to mean supporting learners' understanding of how the language works to enable greater independence, accuracy and fluency. However, teachers will need support to develop and share approaches towards effective grammar teaching and learning in context.

Different languages progress at different rates

Different languages require longer periods of learning to reach comparable levels of proficiency. While the Association recognises that the POS does tacitly acknowledge the different linguistic demands of different languages in relation to phonology, morphology, syntax and script, as is clearly indicated by qualifying statements such as in KS2 '*understand basic grammar **appropriate to the language being studied**, such as (**where relevant**): feminine, masculine etc.* And in KS3, '*identify and use tenses **or other structures**, which convey the present, past and future, **appropriate to the language being studied***, the Association is not fully convinced that the disparity in levels of proficiency possible in the different languages prescribed has been fully appreciated. At this stage, where the POS is simply offering a conceptual framework

for developing the curriculum, this matter is not so serious. It becomes crucial once progress measures are being defined and learning outcomes become more transparent. At this stage, full, explicit account must be taken of the complexities and levels of challenge presented by the different languages.

Problems with the prescribed list of languages at KS2

The list of seven languages for KS2 has met with great controversy and divides opinion among the languages community.

There is currently serious confusion between what constitutes the learning of a new and foreign language for all learners from support for mother tongue literacy. Both are important in their own right. The European Commission makes a very helpful distinction for policy makers with regard to language learning in schools. There are three kinds of language: the language of the curriculum, the foreign language and the mother tongue or home language, if different from the language of the curriculum. In the statutory provision for KS2, the draft POS proposes 5 modern foreign languages broadly responding to the current pattern of provision across the country and two ancient languages from which schools will choose.

In relation to the modern languages proposed, French, German, Spanish, Italian and Mandarin do reflect current patterns of provision. However, there are key languages absent. It is surprising and a cause of concern that Japanese is not included in the list of languages. There is a history of high quality teaching in primary schools of the Japanese language and culture and significant high quality support is available from the Japanese Embassy, the Japan Foundation and the Nihongo Centre. **The place of Japanese should be reviewed in the revised draft of the POS.**

It is also of concern that no account has been taken of special circumstances in faith schools, in particular, Jewish Primary and Secondary Schools, where continuity in teaching Hebrew from KS2 to KS3 will be affected by the exclusion of Hebrew from the proposed statutory list. **The position of Hebrew within the POS should be reviewed.**

It is also of concern that Arabic is not mentioned within the list of proposed languages. **The position of Arabic should be reviewed.**

Support for mother tongue literacy

As so many of our classrooms are multilingual with learners from a variety of different language backgrounds learning together through English, which is not their first language, strategies for learning and using more than one language to acquire knowledge and skills (translanguaging) and support for mother tongue literacy should be addressed as part of the reform of the national curriculum. Such development should include consultation with community leaders, head teachers, teachers of English and other languages, including modern foreign languages and language experts. Research evidence shows that support for mother tongue literacy is highly beneficial for reasons of cognitive development, cultural identity and social cohesion. There is also significant research evidence that bilingualism accelerates cognitive development and

can make for more effective learners across the curriculum.

Fresh approaches to meet the challenges and opportunities of multilingual classrooms should be addressed as part of the National Curriculum Reform. Many of the ambient languages within our school communities could represent potential language capability of strategic longer-term value to our society as a whole. Strategies to develop and valorise such capability should be addressed within the language and literacy curriculum within schools and through supplementary schools. This is a different matter from introducing the learning of a new language into the KS2 and should not replace the opportunity for all learners to experience learning a new language but equally it should be an essential element of curriculum reform for the 21st century school. Language learning in today's multilingual classrooms should involve mother tongue learning as well as support for English and the opportunity to learn a new language.

Possibility of wider language diversification at KS3 and beyond

It is welcomed that any modern language can be studied at KS3 and it is hoped that secondary schools can plan to broaden their language offer and introduce a wider range of languages at KS3, KS4 and KS5, building on the sound foundation from KS2, while consolidating competence in the first foreign language and maximising on language learning skills.

Schools could build capacity and plan to introduce strategically important languages over time such as languages, spoken in the BRIC and CIVETS countries. It is more relevant for learners post age 11 to consider accelerated learning of a range of languages, as research has shown that rapid progress can be made commensurate with maturation and developing metacognition. This does not preclude making substantial progress in one or more languages from age 7.

4 Does the content set out in the draft programmes of study represent a sufficiently ambitious level of challenge for pupils at each key stage?

☒ Sufficiently ambitious

☐

Not sufficiently ambitious

☐

Not sure

Comments:

Yes, in the broadest terms, the POS for languages sets out an ambitious and rigorous pathway to independent language learning to support KS4 and beyond.

What is, as yet, undefined, is a transparent framework for measuring progress. The content statements are generic and although there are progress markers such as *simple to complex and coherent, short and longer, practical and extended 'going beyond immediate needs and interests*, as well as the inclusion of grammar in KS3, there is plainly a need for the development of descriptions of performance and clearer criteria for recognising progress.

5 Do you have any comments on the proposed wording of the attainment targets?

Comments:

We don't have explicit attainment targets. The current statement is too vague and does not adequately support teachers to plan effectively.

It would be recommended to review this situation and define attainment targets which can support learning and progress from KS2 to KS5. These should take account of developments in the revised GCSE.

6 Do you agree that the draft programmes of study provide for effective progression between the key stages?

☒ Agree

☐ Disagree

☐ Not sure

Comments:

Overall, we agree that there is a basis for progression but it needs further development and exemplification.

We have the rudiments of building coherent progress over the key stages but must address the definition of learning outcomes and national expectations. These should not be age specific but should define what learners know and can do. This will serve to incentivise and motivate learners and will be transparent for parents, learners and future employers to understand actual language capability.

As stated in Section 4 above, what is, as yet, undefined, is a transparent framework for measuring progress. The content statements are generic and although there are progress markers such as *simple to complex and coherent, short and longer, practical and extended* 'going beyond immediate needs and interests, as well as the inclusion of grammar in KS3, there is plainly a need for the development of descriptions of performance and clearer criteria for recognising progress.

It would be very helpful to align such developments with the Common European Framework of Reference (CEFR) widely used across Europe in many of the major jurisdictions where languages are shown to be successfully learned to an independent level.

7 Do you agree that we should change the subject information and communication technology to computing, to reflect the content of the new programmes of study?

X Agree

☐

Disagree

☐

Not sure

Comments:

It is helpful to focus more attention on computing programming so that young people can compete in the digital age. However, there is a proviso and that is that digital literacy which informs the learning of other disciplines in primary and secondary schools is not underestimated or ignored. Teaching Information and Communications Technology across the curriculum is a key skill and is recognised as such in other major jurisdictions. It also features prominently in current EU policy recommendations as an essential transversal skill in Rethinking Education for the 21st century.

8 Does the new National Curriculum embody an expectation of higher standards for all children?

☒ Yes

☐ No

☐ Not sure

Comments:

Across the key stages, the POS for modern foreign languages has the potential to represent higher and broader demands in a range of applied language skills which should equip young people to use language for immediate practical purposes in school, higher education and in employment. The current draft of the POS in KS2 and 3 could provide, if appropriate, a context for greater opportunities to learn knowledge and skills from other subject content areas through language, depending on the individual vision and direction of particular schools.

However, the freedom of free schools and academies to opt out of the national curriculum is of serious concern, as this possibility of exemption does not embody the expectation of higher standards for all children, as some may not have the opportunity to learn modern foreign languages at all, if the National Curriculum does not apply to all schools.

9 What impact - either positive or negative - will our proposals have on the 'protected characteristic' groups?

Comments:

This will depend on each school's capacity to implement the new curriculum and in this deregulated system much will depend on the individual vision and commitment of the head teacher and leadership team.

The desire to democratise is laudable but there are many variables which come into play because of the different status of the national curriculum within different school structures e.g. the freedom of academies and free schools to opt out.

How can we ensure that protected characteristic groups are treated equitably in a deregulated system?

10 To what extent will the new National Curriculum make clear to parents what their children should be learning at each stage of their education?

Comments:

As yet, rather opaque in modern foreign languages in terms of learning outcomes at different levels of complexity. Please refer to Section 6. Advocacy of clear descriptions of what learners know, understand and can do aligned to the CEFR would be helpful for parents, learners and employers.

Some form of self-assessment and the potential to develop a Language Portfolio which would have currency across the European Union would also be of intrinsic and extrinsic value to individual learners, schools and parents.

11 What key factors will affect schools' ability to implement the new National Curriculum successfully from September 2014?

Comments:

Conditions for successful learning

There are no recommendations for conditions of successful implementation of the POS, as the format is so minimalist.

The need for non-statutory guidance is incontrovertible. A recommendation about length of taught time in the curriculum would be of great benefit.

Guidance of high quality which has stood the test of time and is trusted by teachers is available in the KS2 Framework for Languages, which was developed through research-informed policy and piloting. There is also valuable guidance available in the **revised** KS3 Framework for Languages.

As previously stated, the successful implementation of the new curriculum depends on a number of variables:

1. statutory provision of language learning, which lays the foundation for further language study post 14, post 16 and into higher education;
2. Willingness of schools and school leaders to set in place strategic development networks for regional and local dialogue to enable joint curriculum planning between primary and secondary schools;
3. Effective transition and transfer arrangements;
4. Development of clear and shared understanding of learning outcomes and expectations at national and local levels;
5. Availability and capacity of primary and secondary teachers with relevant, high quality subject specialist knowledge to introduce languages across KS2 and, where appropriate, reintroduce languages in KS4;
6. Access to high quality professional development for all subject teachers to support curriculum development and planning;
7. Access to intensive language training and high quality online objects for self-study for non-specialists in primary schools and those in need of language upskilling in either primary or secondary sectors.

12 Who is best placed to support schools and/or develop resources that schools will need to teach the new National Curriculum?

Comments:

The need to professionalise and take control of individual subject learning and training is clearly emerging in the current national discourse.

In the deregulated school management system and with less central direction on initial teacher training and CPD, it will be necessary for schools to work in local clusters, hubs and networks.

The most effective mechanism to provide high quality training and access to information is through professional associations. All teachers should be encouraged to join a subject association.

The Association for Language Learning is best placed to offer subject specific development and training for modern foreign languages to its expanding national membership of teachers in primary and secondary schools. The ALL will continue to work in partnership with other CPD providers and with our Cultural Partners such as the Goethe Institut, le Service Culturel, the Consejería de Educación, the Japan Foundation etc., developing resources and providing guidance.

With some reasonable levels of government funding, the ALL could act as the catalyst and coordinator for a national pilot to develop high quality non-statutory guidance which would be tested in the crucible of the classroom and would be subject to peer review from practising teachers.

13 Do you agree that we should amend the legislation to disapply the National Curriculum programmes of study, attainment targets and statutory assessment arrangements, as set out in section 12 of the consultation document?

☐

Agree

X Disagree

☐

Not sure

Comments:

Until clear parameters are set for the new national curriculum, it would be strongly advisable not to disapply the existing POS.

14 Do you have any other comments you would like to make about the proposals in this consultation?

Comments:

The aspiration to provide a new curriculum which will modernise and equip young people irrespective of their background to develop to their full potential through state education is laudable.

It is essential that languages education plays a central role in defining education for the 21st century. This includes the learning of modern foreign languages, support for home languages, where appropriate and the strengthening of the command of English. Languages education in its broadest sense underpins successful learning across much of the curriculum and should involve the richest debate and development, bringing together colleagues from different specialisms, including teachers of English, EAL, modern foreign and community languages.

A coherent national curriculum for languages education should be comprehensive and robust. We have the opening to develop such a programme but this will take time and should be supported explicitly as an aim of the curriculum reform. The current draft of the Modern Foreign Languages POS offers much on which a successful course of study can be based but will need further development and exemplification and would benefit from a reasonable level of resources to support its implementation in schools.

Its success will depend on how well it is understood and this will only happen through provision of high quality training and support through initial and continuing education for teachers, familiarisation and information for head teachers, other education

professionals, including higher education and finally, and most essentially, parents and employers.

The National Curriculum for languages, in common with all other subjects, will rise and fall also on how it is assessed. The developing revised GCSE will be crucial in determining the success or otherwise of curriculum reform.

Other major influences on the success of the National Curriculum will be how schools are regulated and how they are held accountable. The future of the EBacc and its maintenance as a soft accountability measure is of critical importance to the ongoing status and development of languages post 14. If the EBacc weakens in relevance so too will modern foreign languages.

15 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.)

Comments:

Very straightforward but some questions inevitably interrelate and overlap.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply X

E-mail address for acknowledgement: bh327@cam.ac.uk

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

X Yes	<input type="checkbox"/> No
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All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed on-line or emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, tel: 0370 000 2288 / email: carole.edge@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 16 April 2013

Send by post to:

Consultation Unit,
Area 1c,
Castle View House,
East Lane,
Runcorn,
Cheshire,
WA7 2GJ.

Send by e-mail to: NationalCurriculum.CONULTATION@education.gsi.gov.uk